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Attorneys for Defendant
 REGIS CORPORATION

UNITED STATES DISTRICT COURT

IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

EKA NINUA, on behalf of herself and
 others similarly situated,

Plaintiffs,

v.

REGIS CORPORATION; and DOES 1 to
 50, inclusive,

Defendants.

Case No. CV 09 4045 JSW

**STIPULATION AND ~~PROPOSED~~
 ORDER TO CONTINUE MEDIATION
 DEADLINE**

Filing Date: July 13, 2009
 Trial Date: March 7, 2011

1 Plaintiff Eka Ninua ("Plaintiff") and Defendant Regis Corporation ("Defendant")
 2 (collectively the "parties") and hereby stipulate and seek an order of the Court to continue the
 3 mediation deadline in this case, as follows:

4 1. On November 30, 2009, the parties filed a Stipulation and Proposed Order
 5 Selecting ADR Process with the above-captioned court. The parties agreed to participate in
 6 private mediation.

7 2. On December 18, 2009, the Hon. Jeffrey S. White entered a case management
 8 Order which included a deadline for completing the mediation of April 30, 2010.

9 3. The parties subsequently agreed to mediate this matter before Jeffrey Ross on
 10 April 21, 2010.

11 4. In anticipation of the mediation, the parties agreed that Plaintiff's deposition
 12 would go forward on March 30, 2010. Plaintiff requested a Georgian translator for the
 13 deposition. After an extensive search, that included contacting multiple translation companies,
 14 Defendant retained a translator, and the March 30, 2010 deposition of Plaintiff commenced as
 15 scheduled. However, during the course of the deposition, it became evident to both parties that
 16 the translation services were inadequate, creating doubts that a proper record was being made.
 17 Accordingly, Plaintiff's deposition was suspended by agreement of the parties. Defendant has
 18 agreed to conduct a search for a Georgian translator who can translate in realtime and has
 19 experience translating for depositions. Defendant has further agreed that, if necessary, the
 20 deposition may be conducted in the greater Los Angeles area, where Plaintiff lives, if that is the
 21 only location where an acceptable Georgian translator can be found.

22 5. In anticipation of the mediation, the parties also agreed that Plaintiff's Federal
 23 Rule of Civil Procedure 30(b)(6) person most qualified deposition would take place on April 6,
 24 2010. In order to accommodate Plaintiff and her counsel, Defendant has agreed to produce its
 25 designated company representative in San Francisco instead of at the corporation's principal
 26 place of business in Minneapolis, Minnesota. Plaintiff's counsel is not able to take the
 27 deposition on April 6, 2010 in San Francisco, and the deposition cannot be rescheduled before
 28 the mediation date, due to the witnesses' schedule. Accordingly, the parties have agreed to

1 reschedule Plaintiff's FRCP 30(b)(6) person most qualified deposition for another date mutually
2 agreeable to both parties and Defendant's designated company representative.

3 6. In anticipation of the mediation, the parties agreed that Defendant would produce
4 certain sample data regarding its business practices, which has not been produced to date.

5 7. Whereas, in light of the fact that the parties will not be able to have a meaningful
6 mediation without completing Plaintiff's deposition, the FRCP 30(b)(6) person most qualified
7 deposition and production of Defendant's sample data documents, the parties agree that the
8 deadline by which to complete mediation should be extended to June 30, 2010. The parties agree
9 that the rescheduled mediation will go forward with mediator Jeffrey Ross on June 23, 2010.

10 WHEREFORE, it is hereby stipulated by and between the parties that the mediation
11 deadline in this matter be continued from April 30, 2010 to June 30, 2010 or such other later date
12 as the Court should determine.

13 Respectfully submitted,

14 Date: April 6, 2010

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16
17 By: 

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22 Date: April 6, 2010

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REGIS CORPORATION

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~~PROPOSED~~ ORDER

Good cause appearing therefore, as set forth in the above stipulation, the court-ordered deadline for mediation is hereby extended to June 30, 2010.

IT IS SO ORDERED.

DATED: April 9, 2010



HON. JEFFREY S. WHITE
UNITED STATES DISTRICT COURT JUDGE